

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
Old Carco LLC)	
(f/k/a Chrysler LLC), <i>et al.</i> ,)	Case No. 09-50002 (SMB)
)	
Debtors.)	(Jointly Administered)

**ORDER ENFORCING THE COURT’S ORDER (I) AUTHORIZING THE SALE
OF SUBSTANTIALLY ALL OF THE DEBTORS’ ASSETS FREE AND CLEAR
OF ALL LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES, (II) AUTHORIZING
THE ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS
AND UNEXPIRED LEASES IN CONNECTION THEREWITH AND
RELATED PROCEDURES AND (III) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)¹ of FCA US LLC (“FCA US”) for entry of an order (this “Order”) enforcing this Court’s Order (I) Authorizing the Sale of Substantially All of the Debtors’ Assets Free and Clear of All Liens, Claims, Interests and Encumbrances, (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith and Related Procedures and (III) Granting Related Relief [Docket No. 3232] (the “Sale Order”); this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having retained jurisdiction to consider the Motion pursuant to paragraphs 43 and 59 of the Sale Order and Article VIII of the Plan; and venue of these chapter 11 cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that the relief requested in the Motion is in the best interests of all parties in interest; and this Court having found that proper and adequate notice of the Motion and

¹ Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

the relief requested therein has been provided; and any objections to the Motion having been withdrawn or overruled on the merits; and upon the record made by FCA US; and after due deliberation thereon; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Plaintiffs' claims for punitive damages set forth in the Complaint pending in *Overton v. Chrysler Group LLC*, Case No. 01-CV-2017-904376.00, Circuit Court for Jefferson County, Alabama, are barred and enjoined by the Sale Order.
3. Plaintiffs' claims for punitive damages under the Alabama Wrongful Death Act are precluded by the Sale Order.
4. Plaintiffs are directed to amend their Complaint to dismiss, with prejudice, the claims for punitive damages against FCA US contained therein.
5. The requirements set forth in Local Rule 9013-1(b) are satisfied.
6. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement of this Order.

Dated: _____, 2018
New York, New York

Stuart M. Bernstein
United States Bankruptcy Judge